Dear Julie-
As a landscape architect and irrigation designer for over 17 years I would like to state my concerns & recommendations for the proposed changes to the MWELO ordinance.
I am aware that the ordinance is critical in establishing resource efficiency and provisions for water management, however, some of the changes to the ordinance are unrealistic limitations on the structures that enable landscapes to function properly.

My 3 areas of concern are:

1. **Irrigation Efficiency (IE) is raised to 0.85 for residential and 0.92 for commercial projects**.
2. **Evapotranspiration Adjustment Factor (ETAF) is lowered to 0.5 for residential and 0.4 for commercial projects**.
3. **Precipitation Rate is capped at 0.75 in/hr.**

Irrigation Efficiency – ALTERNATE RECOMMENDATION

a. Do not change the value of Irrigation Efficiency in the ETAF calculation. Time constraints in this emergency environment seem to have resulted in an IE - and resulting ETAF recommendation - that is unattainable.
b. Instead, make changes only to the Plant Factor in the ETAF calculation to drive Californians to use lower water use plants.
c. During the process to make long term changes to MWELO, change the Irrigation Efficiency calculation method to include Wind Drift and Evaporation losses. Consider also at that time other possible changes in irrigation technology that may have occurred since the last revision to MWELO in 2010.

Evapotranspiration Adjustment Factor- ALTERNATE RECOMMENDATION

a. Rain Bird recommends not changing Irrigation Efficiency. If IE is maintained at 0.71 as justified and supported in the 2009 White Paper, the recommended ETAF will be more workable and this value should be used in the interim (emergency period).
b. Rain Bird is not expert in ornamental horticulture. Rain Bird is aware, however, that plant palette changes may have a direct impact on human health, safety and welfare, especially as it relates to wild fire protection. While Rain Bird is very concerned about the plant factors being proposed, it will defer to experts in horticulture to comment.

Precipitation Rate- ALTERNATE RECOMMENDATION

a. Do not introduce a new limit on Precipitation Rates in addition to the existing limit on slopes greater than 3:1.
b. Require Smart Controllers that use Precipitation Rate, soil type, root zone depth, and Plant Factor to eliminate run-off and apply the desired amount of water utilizing the well-established practice of ‘cycle and soak’.

Thank you for your service and consideration. Have a most wonderful day-

Stephanie Shermoen

Owner/Landscape Architect CA#5231

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INTEGRATION